

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

vs.

**REX VENTURE GROUP, LLC
d/b/a ZEEKREWARDS.COM, and
PAUL BURKS,**

Defendants,

No. 3:12-CV-519

**RECEIVER'S MOTION TO TRANSFER PROPERTY TO THE RECEIVERSHIP
ESTATE**

Kenneth D. Bell, the Court-appointed Receiver ("Receiver") of Rex Venture Group, LLC d/b/a ZeekRewards.com ("RVG"), respectfully submits this Motion to Transfer Property to the Receivership Estate. The Receiver respectfully requests that the Court impose and enforce an equitable lien on a water-view vacation home in the Turks & Caicos Islands and related assets (collectively, "Turks & Caicos Property") that were purchased with RVG assets that Preferred Merchants Solutions LLC ("Preferred Merchants") and Jaymes Meyer improperly took from an RVG trust account and order that the title and ownership be transferred to the Receivership Estate for the benefit of the victims of the ZeekRewards Ponzi / pyramid scheme.

WHEREFORE, for the foregoing reasons and those set forth in the accompanying Memorandum of Law in Support of the Receiver's Motion to Transfer Property to the Receivership Estate, the Receiver respectfully requests that the Court grant the Receiver's

Motion and order Bella Vista Ltd., and any other party with ownership or other rights to the Turks & Caicos Property, to transfer to the Receivership title and ownership of the Turks & Caicos Islands real property designated as Title # 60609/24 / Norway & Five Cays Section / Providenciales Island along with all improvements, attachments and personal property within and related to the property (including but not limited to furniture, fixtures, a boat and scuba equipment).

Respectfully submitted this 11th day of March, 2015.

By: /s/ Irving M. Brenner
Kenneth D. Bell
N.C. State Bar No. 10800
Irving M. Brenner
N.C. State Bar No. 15483
MCGUIREWOODS LLP
201 North Tryon Street, Suite 3000 (28202)
Post Office Box 31247
Charlotte, North Carolina 28231
Telephone: 704-373-4620
Facsimile: 704-373-8836
kbell@mcguirewoods.com

*Court-appointed Receiver for Rex Venture
Group, LLC d/b/a ZeekRewards.com*

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing using the CM/ECF system for the exclusive consideration of the Court.

This the 11th day of March, 2015.

/s/ Irving M. Brenner
Irving M. Brenner